



Josh Constantin &lt;lcajosh1@gmail.com&gt;

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**2:23-cv-00157-RJS-DAO - Millrocks Second Set of Discovery Propounded to Justin Smith**

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**Josh Constantin** <lcajosh1@gmail.com>  
To: John Keiter <john@keiterlaw.com>

Tue, May 20, 2025 at 11:34 AM







As per my email dated April 28th, 2024, please be advised that I maintain a total and absolute objection to your discovery demands. In accordance with my prior communication, I have provided the bank statements for the three banks I maintained accounts with during the relevant period, specifically from March 2023 through June 2023. These documents further demonstrate that the lawsuit lacks merit and is entirely frivolous.

These statements should fulfill my obligations regarding the specified discovery period. Should you require any clarification concerning the provided documents, please do not hesitate to contact me.

[Quoted text hidden]

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**6 attachments**

-  **Citi April 2023 (Opened).pdf**  
690K
-  **6300 March.pdf**  
31K
-  **6300 April.pdf**  
28K
-  **6300 June.pdf**  
422K
-  **6300 May.pdf**  
615K
-  **BOA savings and checking.pdf**  
337K